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7 Magistrate Judge Brian A. Tsuchida  
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13 UNITED STATES DISTRICT COURT FOR THE  
14 WESTERN DISTRICT OF WASHINGTON  
15 AT SEATTLE  
16

17 UNITED STATES OF AMERICA,  
18 Plaintiff  
19 v.  
20 ROBERT VAN CAMP,  
21 Defendant.

22 CASE NO. MJ22-160  
23 COMPLAINT for VIOLATIONS OF  
24 Title 18, United States Code, Sections 371 &  
25 2320(a)(1)  
26

27 BEFORE, Brian A. Tsuchida, United States Magistrate Judge, U.S. Courthouse,  
28 Seattle, Washington.

29 The undersigned complainant being duly sworn states:

30 **COUNT ONE**

31 **(Conspiracy to Defraud the United States)**

32 From in or around April 2021 through in or around April 2022, at King County, in  
33 the Western District of Washington, and elsewhere, defendant ROBERT VAN CAMP  
34 knowingly and intentionally conspired and agreed with Co-Conspirator-1 and others,  
35 known and unknown, to defraud the United States by impairing, impeding, obstructing,  
36 and defeating through deceit, craft, trickery, and dishonest means, the lawful government  
37 functions of the United States Department of Health and Human Services (“HHS”) and the  
38 Centers for Disease Control and Prevention (“CDC”), a department and agency,

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1 respectively, of the United States, in the administration and distribution of COVID-19  
2 vaccines and COVID-19 vaccination record cards, and the lawful government functions of  
3 other departments and agencies of the United States in administering and enforcing the  
4 government's federal employee vaccination mandate.

5       **A.     Purpose of the Conspiracy**

6       1.     It was the purpose of the conspiracy for VAN CAMP, Co-Conspirator-1, and  
7 their co-conspirators to (a) fraudulently obstruct the government's administration and  
8 distribution of COVID-19 vaccines and the government's federal employee vaccination  
9 mandate, and to interfere with HHS and the CDC's lawful functions to administer the  
10 COVID-19 vaccines and ensure that all COVID-19 vaccines are accompanied by genuine  
11 COVID-19 vaccination record cards; and (b) conceal the manufacturing, distribution, and  
12 use of false and fraudulent COVID-19 vaccination record cards, and the receipt and transfer  
13 of the proceeds of the conspiracy.

14       **B.     Manner and Means of the Conspiracy**

15       2.     The dishonest and deceitful manner and means by which VAN CAMP, Co-  
16 Conspirator-1, and others sought to accomplish the purpose and object of the conspiracy  
17 included, among other things, the following:

18           a.     VAN CAMP and Co-Conspirator-1 obtained an electronic copy of a  
19 blank COVID-19 vaccination record card.

20           b.     The blank COVID-19 vaccination record card obtained by VAN  
21 CAMP and Co-Conspirator-1 appeared visually identical to the official COVID-19  
22 vaccination record cards designed and distributed by the CDC and included both HHS' and  
23 CDC's official government logos.

24           c.     VAN CAMP and others used the blank COVID-19 vaccination record  
25 card to make hundreds of false and fraudulent COVID-19 vaccination cards.

26           d.     In making the false and fraudulent COVID-19 vaccination record  
27 cards, VAN CAMP and others intentionally made the false and fraudulent cards appear  
28 visually indistinguishable from the official COVID-19 vaccination record cards designed

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1 and distributed by the CDC, including by printing them in the same size and by using  
2 similar paper and ink, as official CDC vaccination record cards, and by printing them with  
3 HHS' and CDC's official government logos.

4 e. VAN CAMP sold the false and fraudulent COVID-19 vaccination  
5 record cards for profit to purportedly unvaccinated persons, including Buyer-1, Buyer-2,  
6 and others, including several law enforcement officers acting in an undercover capacity,  
7 specifically Under Cover 1 ("UC1"), Under Cover 2 ("UC2"), Under Cover 3 ("UC3"),  
8 and Under Cover 4 ("UC4") (collectively, "buyers").

9 f. VAN CAMP also sold the false and fraudulent COVID-19  
10 vaccination record cards for profit to individuals who served as distributors for VAN  
11 CAMP to resell to other individuals ("distributors").

12 g. VAN CAMP facilitated the sale of the false and fraudulent COVID-  
13 19 vaccination record cards by communicating with buyers and distributors through the  
14 use of interstate wire communications, including by telephone, text message, and email.

15 h. Before distributing the false and fraudulent COVID-19 vaccination  
16 record cards, VAN CAMP instructed buyers and distributors to provide him the names,  
17 dates of birth, and desired vaccination dates to write on the false and fraudulent vaccination  
18 record cards.

19 i. VAN CAMP further instructed buyers and distributors to either  
20 identify a legitimate local CDC-authorized COVID-19 vaccination provider, or provide  
21 VAN CAMP with location information so that he could identify a local CDC-authorized  
22 COVID-19 vaccination provider, such as a hospital or pharmacy, to make the vaccination  
23 record cards falsely appear as if the purchaser had received a United States Food and Drug  
24 Administration ("FDA")-approved vaccine from a legitimate vaccination provider.

25 j. VAN CAMP also directed buyers and distributors to send him  
26 photographs of legitimate COVID-19 vaccination record cards so that he could obtain  
27 vaccination lot numbers from authentic COVID-19 vaccination record cards, issued by  
28 CDC-authorized providers, to make the cards falsely appear as if the purchaser had

1 received an FDA-approved vaccine with an authentic lot number.

2           k. VAN CAMP used the information provided by buyers and  
3 distributors, and the information he obtained on his own regarding CDC-authorized  
4 vaccination providers and vaccination lot numbers, to completely fill out the false and  
5 fraudulent cards before distributing them to their intended recipients, including writing real  
6 names and dates of birth on the cards, along with inserting false information concerning  
7 vaccination dates, vaccination providers, vaccination sites, vaccination manufacturers, and  
8 vaccination lot numbers.

9           l. VAN CAMP distributed hundreds of completed false and fraudulent  
10 COVID-19 vaccination record cards to purchasers in the Western District of Washington,  
11 and elsewhere, including by mailing the false and fraudulent cards to buyers and  
12 distributors located in the Western District of Washington and elsewhere.

13           m. VAN CAMP sold and distributed false and fraudulent COVID-19  
14 vaccination record cards to federal employees who were required to be vaccinated against  
15 COVID-19 pursuant to the federal employee vaccination requirement.

16           n. VAN CAMP and Co-Conspirator-1 made thousands of dollars from  
17 the sale of false and fraudulent COVID-19 vaccination record cards to purchasers in the  
18 Western District of Washington and elsewhere, including by receiving payments for the  
19 false and fraudulent vaccination record cards made in cash, by check, by money order, and  
20 through a Venmo account held in Co-Conspirator-1's name.

21           o. In order to conceal and disguise the scheme, VAN CAMP used, and  
22 directed others to use, code names when communicating about the false and fraudulent  
23 COVID-19 vaccination record cards, such as "gift card," "restaurant gift card," and  
24 "consulting." These and other similar code names were used to make false notations on  
25 payments made to VAN CAMP and Co-Conspirator-1 for the false and fraudulent  
26 vaccination record cards, including on payments made in the Western District of  
27 Washington.

28           p. To further conceal and disguise the scheme, VAN CAMP instructed

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1 buyers and distributors to delete their communications with him regarding the false and  
2 fraudulent COVID-19 vaccination record cards.

3       **C.     Overt Acts in Furtherance of the Conspiracy**

4       3.     In furtherance of the conspiracy, and to accomplish its objects and purpose,  
5 the conspirators committed and caused to be committed, at King County, in the Western  
6 District of Washington, and elsewhere, the following overt acts, among others:

7           a.     On or about April 14, 2021, VAN CAMP forwarded via email an  
8 electronic file of a blank COVID-19 vaccination record card to Printer-1, a printing and  
9 shipping store, for the purpose of having false and fraudulent COVID-19 vaccinations  
10 record cards printed, noting in the email that he received the blank COVID-19 vaccination  
11 record card from Co-Conspirator-1.

12          b.     On or about September 20, 2021, VAN CAMP sold five completed  
13 false and fraudulent COVID-19 vaccination record cards to UC1.

14          c.     On or about September 29, 2021, VAN CAMP mailed five completed  
15 false and fraudulent vaccination record cards to UC2.

16          d.     On or about October 7, 2021, VAN CAMP mailed completed false  
17 and fraudulent COVID-19 vaccination record cards to Buyer-1, to an address in Burien,  
18 Washington, in the Western District of Washington.

19          e.     On or about December 7, 2021, VAN CAMP mailed additional  
20 completed false and fraudulent COVID-19 vaccination record cards to Buyer-1 to the same  
21 address in Burien, Washington, in the Western District of Washington.

22          f.     On or about January 26, 2022, VAN CAMP mailed a completed false  
23 and fraudulent COVID-19 vaccination record card to Buyer-2, to an address in  
24 Woodinville, Washington, in the Western District of Washington.

25          g.     On or about March 7, 2022, VAN CAMP mailed a completed false  
26 and fraudulent vaccination record card to UC3.

27          h.     On or about April 11, 2022, VAN CAMP mailed a completed false  
28 and fraudulent COVID-19 vaccination record card to UC4, to an address in Seattle,

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1 Washington, in the Western District of Washington.

2 All in violation of Title 18, United States Code, Section 371.

3 **COUNT TWO**

4 **(Trafficking in Counterfeit Goods)**

5 On or about April 11, 2022, at Seattle, in the Western District of Washington, and  
6 elsewhere, defendant ROBERT VAN CAMP did intentionally traffic in goods, specifically  
7 a false and fraudulent COVID-19 vaccination record card bearing CDC's trademarked  
8 logo, knowingly using a counterfeit mark, namely U.S. Trademark Registration 6672285,  
9 on and in connection with such goods.

10 In violation of Title 18, United States Code, Section 2320(a)(1).

11 And the complainant states that this Complaint is based on the following  
12 information:

13 I, LUSILLA PACHECO, being first duly sworn on oath, depose and say:

14 1. I am a Special Agent of the United States Department of Health and Human  
15 Services—Office of Inspector General (“HHS-OIG”) currently assigned to the Kansas City  
16 Region and based in the Denver Field Office. I have been employed as an HHS-OIG  
17 Special Agent since 2016. My duties as a Special Agent include conducting criminal and  
18 civil investigations involving programs and operations of HHS, including both Medicare  
19 and Medicaid fraud. I have investigated criminal violations against the United States,  
20 including numerous and varied health care-related crimes. I have also attended basic and  
21 continued training on federal laws and have effectuated a wide range of law enforcement  
22 methods when conducting criminal and civil investigations.

23 2. The information contained in this Complaint is the result of my own  
24 investigation as well as information provided to me by others, including other investigators  
25 and law enforcement officers. In each instance when I recite information from such others,  
26 I have gained that information either by talking directly to such investigators and law  
27 enforcement officers or by reviewing written reports of their investigation, or both. This  
28 Complaint accurately summarizes some of the evidence I discovered during my

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1 investigation; it does not, however, contain every detail known to me about the  
 2 investigation.

3 **FACTS ESTABLISHING PROBABLE CAUSE**

4 ***The Federal COVID-19 Vaccination Program***

5 3. In or around January 2020, the Secretary of HHS declared a national public  
 6 emergency under Title 42, United States Code, Section 247d, as a result of the spread of  
 7 the novel coronavirus COVID-19 within the United States. On or about March 13, 2020,  
 8 the President of the United States issued Proclamation 9994 declaring a national emergency  
 9 beginning on March 1, 2020, as a result of the rapid spread of COVID-19.

10 4. To help combat COVID-19 and the resulting pandemic, in May 2020, the  
 11 United States initiated Operation Warp Speed, later renamed HHS-DOD COVID19  
 12 Countermeasures Acceleration Group (“CAG”), a partnership between HHS, the  
 13 Department of Defense, and other federal agencies, which existed through December 31,  
 14 2021, to make safe and effective vaccines available as quickly as possible. The principal  
 15 purpose of CAG was to ensure that every American could receive a COVID-19 vaccine by  
 16 supporting the acceleration of vaccine development, manufacturing, and distribution to  
 17 states, other jurisdictions, and federal agencies and programs for vaccine administration.

18 5. Upon awarding contracts and providing funding, by September 2021, the  
 19 federal government had acquired over 673 million doses of vaccines developed by  
 20 Moderna, Pfizer, and Johnson and Johnson, which was sufficient to fully vaccinate 373  
 21 million people, in line with CAG’s overall goal of making sufficient adult vaccines  
 22 available free of charge for the American public.

23 6. In order to enable their rapid distribution upon the development of safe and  
 24 effective COVID-19 vaccines, the Secretary of HHS issued a notice, pursuant to section  
 25 564 of the Federal Food, Drug, and Cosmetic Act, that there was a public health emergency  
 26 that had a significant potential to affect national security or the health and security of  
 27 United States citizens living abroad and that circumstances existed justifying the  
 28 authorization of emergency use of drugs and biological products during the COVID-19

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1 pandemic. Pursuant to the authority granted under this declaration, the United States Food  
 2 and Drug Administration approved the Pfizer COVID-19 vaccine for emergency use on or  
 3 about December 11, 2020, the Moderna COVID-19 vaccine for emergency use on or about  
 4 December 18, 2020, and the Johnson and Johnson COVID-19 vaccine for emergency use  
 5 on or about February 27, 2021 (together, the “COVID-19 vaccines”).

6       7. To ensure that each American could receive a COVID-19 vaccine, the CDC  
 7 prepared for widespread administration, distribution, and tracking of the administration of  
 8 COVID-19 vaccines. Vaccine allocation and centralized distribution utilized HHS’s  
 9 Vaccine Tracking System (VTrckS), a secure, web-based system that integrated the entire  
 10 publicly funded vaccine supply chain from purchasing and ordering, through distribution  
 11 to participating state, local, and territorial health departments and health care providers.

12       8. The CDC controlled the distribution of COVID-19 vaccines and COVID-19  
 13 vaccination record cards, distributing them only to medical providers that were eligible to  
 14 administer the COVID-19 vaccines.

15       9. To be eligible to administer the COVID-19 vaccines, medical providers and  
 16 other administrators of COVID-19 vaccines were required to enter into provider agreements  
 17 with the CDC (“COVID-19 Provider Agreement”).

18       10. Additionally, per the COVID-19 Provider Agreement, medical providers and  
 19 other administrators of COVID-19 vaccines agreed, and were required, to “provide a  
 20 completed COVID-19 vaccination record card to every COVID-19 [v]accine recipient, the  
 21 adult caregiver accompanying the recipient, or other legal representative” (“COVID-19  
 22 vaccination record card”).

23       11. The COVID-19 vaccination record cards were designed and printed  
 24 according to CDC specifications and requirements, and contained both HHS’ and CDC’s  
 25 official government logos. The COVID-19 vaccination record cards recorded the name  
 26 and date of birth of the individual receiving the COVID-19 vaccine, the name of the  
 27 manufacturer of the COVID-19 vaccine administered, the date when each dose was  
 28 administered, the location where each dose was administered, and the lot number of the

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1 vaccine dose. A lot number is a unique number given by vaccine manufacturers to a  
2 specific batch of a vaccine.

3       12. The CDC mandated that valid proof of COVID-19 vaccination, specifically,  
4 the COVID-19 vaccination record card, could only be provided to individuals by  
5 authorized providers administering COVID-19 vaccines.

## ***Federal Employee Vaccination Requirement***

7       13. On September 9, 2021, the President of the United States issued Executive  
8 Order 14043, Requiring Coronavirus Disease 2019 Vaccination for Federal Employees,  
9 which required all federal agencies to implement a policy requiring all federal employees  
10 to be vaccinated against COVID-19. The Executive Order stated that the CDC “has  
11 determined that the best way to slow the spread of COVID-19 and to prevent infection by  
12 the Delta variant or other variants is to be vaccinated” and that “to promote the health and  
13 safety of the Federal workforce and the efficiency of the civil service, it is necessary to  
14 require COVID-19 vaccination for all Federal employees.”

### ***The Defendant and Other Relevant Individuals and Entities***

16        14. Defendant VAN CAMP was a resident of Parker, Colorado and Bulverde,  
17 Texas. VAN CAMP published magazines which contained advertisements and promotions  
18 from various businesses. VAN CAMP also headed the business networking associations  
19 Parker Best Leads Group in Parker, Colorado, and Castle Rock Best Leads Group in Castle  
20 Rock, Colorado.

21       15. Co-Conspirator-1 was a resident of Parker, Colorado and Bulverde, Texas.  
22 VAN CAMP and Co-Conspirator-1 resided together. Co-Conspirator-1 was employed by  
23 a private contractor in the defense industry and had a Top Secret security clearance.

24        16. The CDC was a federal agency under HHS. The CDC was established to  
25 protect public health through the prevention of disease.

26 || 17. Buyer-1 was a resident of Burien, Washington.

27 18. Buyer-2 was a resident of Woodinville, Washington.

## *Overview of the Scheme*

2       19. As described further below, evidence obtained in this investigation  
3 demonstrates that, from in or around April 2021 through in or around April 2022, VAN  
4 CAMP, Co-Conspirator-1, and others engaged in a scheme to produce, sell, and distribute  
5 false and fraudulent COVID-19 vaccination record cards to hundreds of individuals in at  
6 least a dozen states, including to individuals in the Western District of Washington.  
7 Among other things, VAN CAMP and others intentionally produced the false and  
8 fraudulent COVID-19 vaccination record cards to make them appear visually  
9 indistinguishable from the legitimate vaccination record cards designed and distributed by  
10 the CDC. Furthermore, VAN CAMP filled out the false and fraudulent COVID-19  
11 vaccination record cards completely before distributing them to their intended recipients,  
12 inserting real names and dates of birth on the cards along with false vaccination date,  
13 vaccination provider, vaccination site, vaccination manufacturer, and vaccination lot  
14 number information.

15        20. The evidence obtained in this investigation further demonstrates that VAN  
16 CAMP and Co-Conspirator-1, among others, agreed to work together in advancing the  
17 purpose of the conspiracy. As described herein, among other things, Co-Conspirator-1  
18 obtained a blank COVID-19 vaccination record card. Co-Conspirator-1 then provided that  
19 blank COVID-19 vaccination record card to VAN CAMP, which VAN CAMP then sent  
20 to Printer-1 on several occasions for the purpose of having false and fraudulent COVID-  
21 19 vaccination record cards printed. Based on the investigation, it appears that the blank  
22 COVID-19 vaccination record card obtained by Co-Conspirator-1 served as the template  
23 for the hundreds of false and fraudulent vaccination record cards produced and sold in the  
24 scheme. Moreover, Co-Conspirator-1 personally profited from the scheme because  
25 numerous payments for the false and fraudulent COVID-19 vaccination record cards were  
26 made to a Venmo account held by Co-Conspirator-1. In addition, at least one witness heard  
27 VAN CAMP state that he had inside knowledge about COVID-19 vaccination record cards  
28 because of Co-Conspirator-1's security clearance.

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Witness-1 and Witness-2

21. Federal agents interviewed Witness-1 and Witness-2, both of whom attended meetings of the business networking associations headed by VAN CAMP.

22. Witness-1 saw VAN CAMP offering to sell false and fraudulent COVID-19 vaccination record cards at a meeting that occurred in or around April or May 2021 and observed that VAN CAMP had a pile of false and fraudulent COVID-19 vaccination record cards in his possession. Witness-1 confronted VAN CAMP at the meeting, telling VAN CAMP that he should not be selling the cards, but VAN CAMP responded that he did not care what Witness-1 thought.

23. Witness-2 also saw VAN CAMP offering to sell false and fraudulent COVID vaccination record cards at a separate meeting that occurred in or around March or April 2021. According to Witness-2, VAN CAMP had a two-inch stack of false and fraudulent COVID-19 vaccination record cards and was offering to sell the cards for \$17 to \$20 each. Witness-2 heard VAN CAMP say that he had inside knowledge about COVID-19 vaccination record cards because Co-Conspirator-1 had a security clearance.

## ***Sale of False and Fraudulent Vaccination Record Cards to UC1***

24. On or about September 13, 2021, VAN CAMP offered to sell false and fraudulent COVID-19 vaccination record cards to UC1, an undercover federal agent. VAN CAMP began the discussion by stating, “How are you guys doing that whole vaccine bullshit?” VAN CAMP then said, “I kinda have a hookup on the real, real ‘V’ card, you know what I’m saying? Like I can hook you and all of your employees up so if anybody asks you can show them the card. I’ve done it for about 700 of my customers.” VAN CAMP told UC1 to refer to the false and fraudulent COVID-19 vaccination record cards as “restaurant gift cards.” VAN CAMP instructed UC1 to provide the first name, middle initial, last name, and birth date of each individual who wanted to buy a false and fraudulent vaccination record card. VAN CAMP told UC1 to send this information to VAN CAMP’s email address, which VAN CAMP provided to UC1.

25. On or about September 20, 2021, at or near Castle Rock, Colorado, VAN  
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1 CAMP sold five false and fraudulent COVID-19 vaccination record cards to UC1, charging  
2 \$600 (or \$120 per card), which UC1 paid in cash. During the sale, VAN CAMP stated,  
3 “Pretty fucking nice, huh? I call them a work of art. I’ve been a printer for 30 years so  
4 this was easy for me.” VAN CAMP also stated that the false and fraudulent cards were  
5 made with “real paper, size, weight, color, it’s the real CDC logo print file” and that “I  
6 have the Pfizer lot numbers, the vials, for 9-1-21 . . . I get them every month.”

7       26. VAN CAMP also made the following statements to UC1, "I've got people  
8 that are going to the Olympics in Tokyo, three Olympians and their coach in Tokyo,  
9 Amsterdam, Hawaii, Costa Rica, Honduras. I've got a company, a veterinary company,  
10 has 30 people going to Canada every fucking day, Canada back. Mexico is big. And like  
11 I said, I'm in 12 or 13 states, so until I get caught and go to jail, fuck it, I'm taking the  
12 money, (laughs)! I don't care. I've saved a thousand lives. I mean we're talking about  
13 people who can't go to work, can't go to school, and their losing their job, it's insane they  
14 can't travel because of this bullshit." VAN CAMP added, "And what they're doing is  
15 wrong, we know this, so how is what I'm doing wrong. If they're wrong, I'm just kinda  
16 fixing this wrong, is all I'm doing. It's not like I'm making hundred-dollar bills."

17        27. VAN CAMP filled out the five false and fraudulent vaccinations record cards  
18 completely before selling them to UC1, inserting the names and dates of birth previously  
19 provided by UC1, together with false vaccination date, vaccination provider, vaccination  
20 site, vaccination manufacturer, and vaccination lot number information.

## ***Sale of False and Fraudulent Vaccination Record Cards to UC2***

22        28. On or about September 23, 2021, VAN CAMP offered to sell false and  
23 fraudulent COVID-19 vaccination record cards to UC2, another undercover federal agent.  
24 VAN CAMP told UC2 that his vaccination record cards were the “real deal” because they  
25 were made with the correct paper, ink, logos, and lot numbers. After VAN CAMP  
26 commented that some people were worried about the lot numbers that he was using on his  
27 false and fraudulent COVID-19 vaccination record cards, VAN CAMP stated, “If there  
28 comes a point where they’re figuring out how to manage lot numbers and databases, we’re

1 all screwed, it's time . . . I've got guns and ammo ready to go for that day."

2       29. VAN CAMP told UC2 that his false and fraudulent COVID-19 vaccination  
 3 record cards have "been to the Olympics, Honduras, Costa Rica, Canada, France, Turks  
 4 and Caicos, twelve different states, so my cards are fucking worldwide. I mean, these  
 5 things are gold."

6       30. When UC2 asked VAN CAMP if the false and fraudulent COVID-19  
 7 vaccination record cards would be sufficient for the digital passport, VAN CAMP stated,  
 8 "What's happening is there will be a digital passport that they'll sucker sheep into putting  
 9 their, their vaccine cards onto, but just like the apps that are out there, it's all bullshit, don't  
 10 do it."

11      31. VAN CAMP also said, "My cards are fucking beautiful. Now they are not  
 12 fake. They're the exact perfect card. It's not even really a fake or a copy – it's the card.  
 13 It's just you didn't go to a hospital to get it, you got it from me. But it is the card."

14      32. VAN CAMP then stated that he was making thirty to forty false and  
 15 fraudulent vaccination record cards a night and that making the cards was a full-time job.

16      33. VAN CAMP instructed UC2 to find a pharmacy near where UC2 lived that  
 17 offered free COVID-19 vaccines and to provide VAN CAMP with that pharmacy's store  
 18 number, which UC2 later did. VAN CAMP said that it would be even better if UC2 could  
 19 take a photograph of a friend's legitimate COVID-19 vaccination record card so that VAN  
 20 CAMP could obtain an authentic vaccination lot number. VAN CAMP also instructed  
 21 UC2 to delete communications with him from UC2's phone.

22      34. Later that same day, on or about September 23, 2021, VAN CAMP spoke  
 23 again with UC2. VAN CAMP asked UC2 if any of the individuals who wanted to purchase  
 24 the false and fraudulent COVID-19 vaccination record cards wanted particular dates listed  
 25 for when they purportedly received the vaccine, explaining that if any of these individuals  
 26 were getting on an airplane soon, the airlines prefer that the second COVID-19 dose be  
 27 administered fifteen days before the flight. VAN CAMP also asked if any of the  
 28 individuals getting the false and fraudulent cards were married. When UC2 said that one

1 of the individuals was UC2's romantic partner, VAN CAMP stated that he would create  
 2 the false and fraudulent cards for UC2 and UC2's romantic partner to look different from  
 3 one another, so that the cards would not look like they came off an assembly line when  
 4 they travelled together.

5       35. In the same conversation with UC2, VAN CAMP stated the following, "Do  
 6 you know the United States Post Office does not have to take the vaccine? Do you know  
 7 that?" VAN CAMP then stated, "Yeah, neither does the fucking Congress. The Congress  
 8 is exempt from the, from the vaccine. The Post Office, exempt. Are you fucking kidding  
 9 me? What? Yeah, study that shit. That's because people don't study. I study. Like, I'm  
 10 not making cards cause I'm bored, I'm making cards cause I'm in the middle of a fucking  
 11 war and I, and I have a lot of guns and ammo, like an arsenal, and I'm trying not to kill  
 12 anybody, so I'm, I'm exhausting myself doing cards, that I'm too tired to kill people, but  
 13 people need to go, like this is some evil, it literally is good versus evil, this is bad. When  
 14 the Congress and Post Office don't have to take it, but we, the sheeple, have to, come on  
 15 man. It's red flag after red flag that these sheep don't see. I don't even get it." VAN  
 16 CAMP subsequently said, "I love to fight, I want to fight."

17       36. VAN CAMP sold five false and fraudulent COVID-19 vaccination records  
 18 cards to UC2, which VAN CAMP filled out completely, using information provided by  
 19 UC2, before mailing them to UC2 on or about September 29, 2021. VAN CAMP charged  
 20 UC2 \$750 (or \$150 per card). VAN CAMP told UC2 that UC2 could pay for the cards via  
 21 Venmo and provided the user-name associated with the Venmo account held in Co-  
 22 Conspirator-1's name. UC2 paid for the false and fraudulent cards using a money order.

***Sale of False and Fraudulent Vaccination Record Cards to Buyer-1***

23       37. As described in more detail below, federal agents conducted a trash pull at  
 24 VAN CAMP and Co-Conspirator-1's residence on October 14, 2021. Documents  
 25 recovered in the trash pull included a "Card List" stating "[Buyer-1's first name]-Seattle-  
 26 1x," a "Card Order\$" stating "[Buyer-1's first name]-2x-\$150," and a torn up COVID-19  
 27 vaccination record card in the name of Buyer-1, stating that Buyer-1 purportedly received  
 28

1 the vaccine at a specific pharmacy in Burien, Washington.

2       38. Shipment records obtained from a Google account belonging to VAN CAMP  
 3 show that VAN CAMP mailed packages addressed to the “[Buyer-1’s last name] Family”  
 4 to an address in Burien, Washington on or about October 7, 2021 (with delivery confirmed  
 5 on or about October 11, 2021) and on or about December 7, 2021 (with delivery confirmed  
 6 on or about December 10, 2021).

7       39. In addition, records obtained from Venmo show that closely following each  
 8 of VAN CAMP’s shipments to Buyer-1 in Burien, Washington—specifically on or around  
 9 October 13, 2021, and on or around December 18, 2021—Buyer-1 initiated wire  
 10 transmissions, from an IP address located in the Western District of Washington, to make  
 11 payments of \$485 and \$330, respectively, to the Venmo account held in Co-Conspirator-  
 12 1’s name.

13                   ***Sale of False and Fraudulent Vaccination Record Card to Buyer-2***

14       40. The records that federal agents obtained from VAN CAMP’s Google account  
 15 included a photograph of a completed COVID-19 vaccination record card in the name of  
 16 Buyer-2, stating that Buyer-2 purportedly received the vaccine at a specific pharmacy in  
 17 Woodinville, Washington. The handwriting used on the vaccination record card in Buyer-  
 18 2’s name resembles the same handwriting used on the vaccination record cards sold by  
 19 VAN CAMP to undercover federal agents.

20       41. Shipment records obtained from VAN CAMP’s Google account show that  
 21 VAN CAMP mailed a package addressed to the “[Buyer-2’s last name] Family” to an  
 22 address in Woodinville, Washington on or around January 26, 2022.

23       42. In addition, records obtained from Venmo show that on the day before VAN  
 24 CAMP’s shipment to Buyer-2 in Woodinville, Washington—specifically on or around  
 25 January 25, 2022—Buyer-2 initiated a wire transmission, from an IP address located in the  
 26 Western District of Washington, to make a \$190 payment to the Venmo account held in  
 27 Co-Conspirator-1’s name.

1                   ***Sale of False and Fraudulent Vaccination Record Card to UC3***

2       43. On or about February 23, 2022, VAN CAMP offered to sell a false and  
 3 fraudulent COVID-19 record vaccination record card to UC3, a third undercover federal  
 4 agent. VAN CAMP directed UC3 to provide a first name, middle initial, and zip code. On  
 5 or about February 24, 2022, VAN CAMP then identified a CDC-authorized vaccine  
 6 provider near UC3's zip code to use on UC3's false and fraudulent COVID-19 vaccination  
 7 record card.

8       44. During a phone conversation on or about February 24, 2022, VAN CAMP  
 9 told UC3 that his customers can reference "consulting" when paying him for the false and  
 10 fraudulent cards. VAN CAMP further told UC3 that he mailed false and fraudulent cards  
 11 "all the time" to another individual who lived near UC3 and described that individual as  
 12 one of his top producers.

13      45. VAN CAMP subsequently said that Co-Conspirator-1 was required to  
 14 receive a COVID-19 vaccination as a condition of employment, stating that, "[Co-  
 15 Conspirator-1] had a TS clearance for twenty-one years and they did not let [Co-  
 16 Conspirator-1] get away with it so [Co-Conspirator-1] was like fuck you and quit [the] job  
 17 after 21 years." VAN CAMP then stated the following, "One of my best friends here, he  
 18 was going to term out, he's NSA, he's like, he goes Robbie, I got 3 kids, I just can't fucking  
 19 quit yet. If the card doesn't work, well, I was going to quit anyway so let me try it and he  
 20 called me back the next day almost in tears and he's like dude, it fucking worked. He was  
 21 so happy. So he gets to keep his job for a few more years."

22      46. During that same phone call, VAN CAMP told UC3 that he had mailed false  
 23 and fraudulent vaccination record cards to approximately fourteen different states. VAN  
 24 CAMP also told UC3 to delete their communications regarding the false and fraudulent  
 25 vaccination record cards.

26      47. VAN CAMP charged UC3 \$175 for the false and fraudulent COVID-19  
 27 vaccination record card, plus \$15 for shipping, which UC3 paid via a money order. On or  
 28 about March 7, 2022, VAN CAMP mailed the false and fraudulent vaccination record card

1 to UC3, which UC3 received on or about March 8, 2022. VAN CAMP filled out the false  
 2 and fraudulent COVID-19 vaccination record card completely before mailing it to UC3,  
 3 inserting the name and date of birth that UC3 provided to VAN CAMP along with false  
 4 vaccination information.

***Sale of False and Fraudulent Vaccination Record Card to UC4***

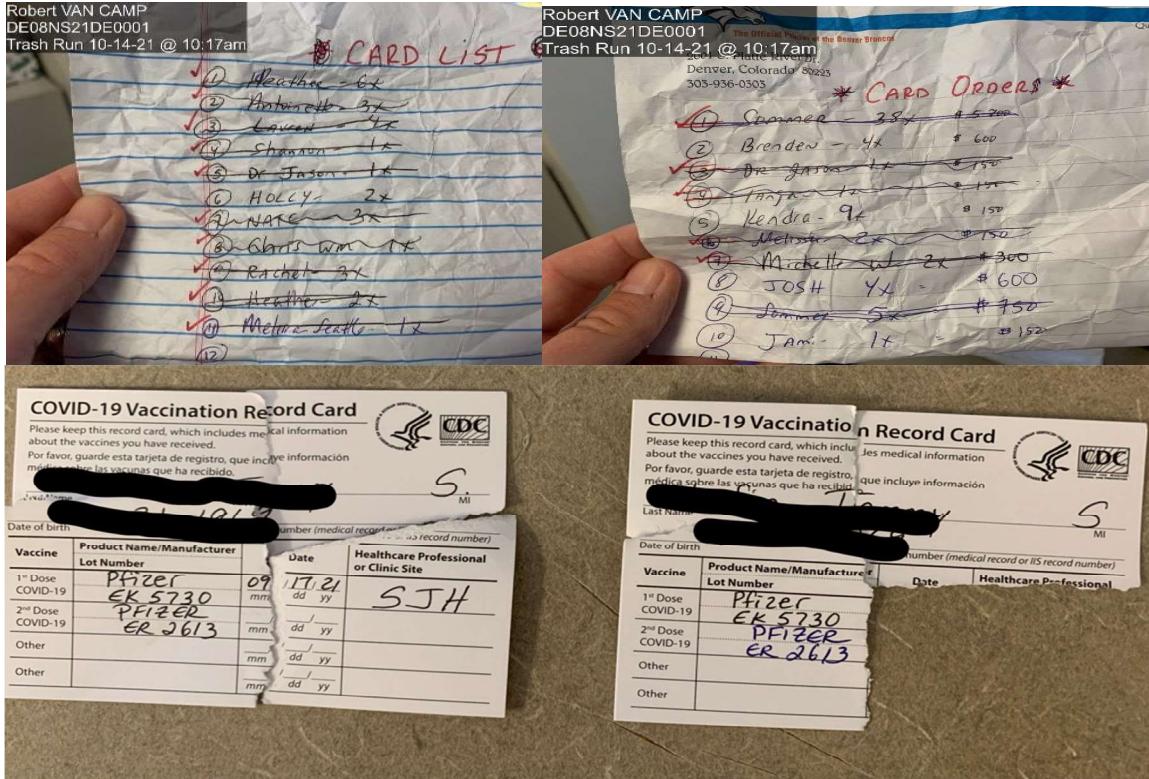
6 48. On or about April 6, 2022, VAN CAMP offered to sell a false and fraudulent  
 7 COVID-19 vaccination record card to UC4, an undercover federal agent located in Seattle,  
 8 Washington. UC4 sent a text message to VAN CAMP asking to get some “gift cards.”  
 9 VAN CAMP told UC4 that he needed UC4’s “1st name, middle initial, last name and bday,  
 10 zip code,” which UC4 subsequently provided. VAN CAMP informed UC4 that the false  
 11 and fraudulent vaccination record card cost \$175, plus \$15 for shipping, and said that he  
 12 “can do it 2nite and mail ups tomorrow.” VAN CAMP requested UC4’s address and was  
 13 provided an address in Seattle, Washington.

14 49. On or about April 7, 2022, VAN CAMP sent UC4 a photograph of a  
 15 completely filled out false and fraudulent vaccination record card, bearing the name and  
 16 date of birth that UC4 provided to VAN CAMP along with false vaccination information.  
 17 As with the other false and fraudulent vaccination record cards produced and sold by VAN  
 18 CAMP, the card VAN CAMP made for UC4 bore the CDC’s official logo. On or about  
 19 April 11, 2022, VAN CAMP mailed the false and fraudulent vaccination record card from  
 20 Colorado to Seattle, which UC4 received in Seattle on or about April 12, 2022. UC4 paid  
 21 for the false and fraudulent card using a money order, which UC4 sent from Seattle to  
 22 Colorado, at the direction of VAN CAMP, on or about April 7, 2022.

***Evidence Recovered from VAN CAMP and Co-Conspirator-1’s Trash***

24 50. On October 14, 2021, federal agents conducted a trash pull at VAN CAMP  
 25 and Co-Conspirator-1’s residence in Parker, Colorado. Among other evidence, the  
 26 following items were found in VAN CAMP and Co-Conspirator-1’s trash: (a) handwritten  
 27 documents titled “Card List” and “Card Order\$” containing names of individuals,  
 28 quantities, and dollar amounts; (b) other handwritten notes containing names and dates of

1 birth, including one with the notation “First date of shot Oct. 4 – then three weeks later for  
 2 2nd;” and (c) numerous torn up COVID-19 vaccination record cards: Photographs of some  
 3 of these items are shown below:



### Venmo Records

51. As described above, VAN CAMP told UC2 that UC2 could pay for the false and fraudulent COVID-19 vaccination record cards through Venmo and provided UC2 the user-name for that account, which is the same name as Co-Conspirator-1. Records obtained from Venmo corroborate that the account was created by Co-Conspirator-1.

52. Based on a review of the transactional data, law enforcement has identified at least approximately 74 payments made to this Venmo account between approximately June 22, 2021 and February 14, 2022 for the purpose of purchasing false and fraudulent COVID-19 vaccination record cards, including payments made from numerous purchasers who initiated wire transmissions from IP addresses located in the Western District of Washington. There is probable cause to believe that these approximately 74 payments

were for false and fraudulent vaccination record cards for several reasons, among them:

a. They were made by individuals identified as vaccination record card purchasers based on other evidence, including VAN CAMP's email communications, shipment records, and photographs of vaccination record cards obtained from VAN CAMP's Google account, as well as evidence obtained in the trash pull;

b. The notation associated with the payment strongly suggests that it was for a vaccination record card, including using the term “gift card” or “consulting,” which are code names that VAN CAMP instructed buyers to use in connection with the false and fraudulent vaccination record cards; and/or

c. The payment amounts are consistent with (or a multiple of) what VAN CAMP charged for false and fraudulent vaccination record cards at various points in time.

53. For example, the Venmo records show that the 74 approximate payments include:

a. Approximately 26 payments with a notation stating “gift,” or “gift card,” “gift cards,” “GC,” “card,” or including the following symbol: ;

b. An additional 13 payments with a notation stating "consulting," "consult," or "consultation;" and

c. Several additional payments with other suspicious notations, including references to "Dr. Flouci," "Freedom," and the following symbol, which appears to be a syringe: .

**Electronic Communications**

54. Pursuant to a search warrant, federal agents obtained records and communications from the Google account that VAN CAMP identified as belonging to him in his discussions with UC1. A review of these Google records further corroborates that VAN CAMP, Co-Conspirator-1, and others engaged in a scheme to produce, sell, and distribute false and fraudulent COVID-19 vaccination record cards.

55. Examples of communications and records obtained from VAN CAMP's

1 Google account include the following:

2       a. On or about April 28, 2021, an individual sent VAN CAMP a job  
3 listing that included a proof of vaccination requirement, stating, “Excited to see the card  
4 you have made.” VAN CAMP replied, “Wow, proof of Vac needed? Looks like the card  
5 may come in handy?”

6       b. On or about June 20, 2021, an individual sent VAN CAMP eleven  
7 names, providing a date of birth for each name, stating in part, “They will all use the  
8 hospital code PHHS. (same as mine).”

9       c. On or about August 10, 2021, VAN CAMP sent an email to Printer-1  
10 with the subject line “Robbie needs 72 more cards please.” In the body of the message,  
11 VAN CAMP wrote, “PURE INSANITY!!!! Dammit!!!!”

12       d. On or about August 23, 2021, VAN CAMP received a message with  
13 the subject line “Wedding list FINAL!!! :)” containing 22 names, providing a birth date  
14 for each name. Listed next to each name was either two specific dates (three weeks apart  
15 from one another) or the notation “any date.”

16       e. On or about September 7, 2021, VAN CAMP sent an email to Printer-  
17 1 with the subject line “Robbie Special Gift Card.” In the body of the message, VAN  
18 CAMP wrote, “I need 144 more of the Restaurant Gift Cards.” In a subsequent message  
19 to Printer-1 sent that same day, VAN CAMP wrote, “here is the file . . . front and back,”  
20 and attached the file of the blank COVID-19 vaccination record card that VAN CAMP  
21 obtained from Co-Conspirator-1.

22       f. On or about September 7, 2021, VAN CAMP received an email with  
23 the subject “gift cards” attaching a file named “jab” that contained 14 names and dates of  
24 birth. VAN CAMP replied, “No custom dates?”

25       g. On or about November 8, 2021, VAN CAMP received an email  
26 stating, “I had a friend inquiring about your business . . . Am I able to give her your info?”  
27 VAN CAMP replied, “Absolutely! She needs to say that she heard about my Restaurant  
28 Gift cards from u.”

56. In addition, VAN CAMP's Google account records include dozens of photographs of COVID-19 vaccination record cards that are completely filled out and written in handwriting that resembles the same handwriting used on the false and fraudulent vaccination record cards that VAN CAMP sold to the undercover agents. The vaccination record cards depicted in these photographs appear to have been produced using the blank COVID-19 vaccination record card that VAN CAMP said he obtained from Co-Conspirator-1, per the April 14, 2021 email described above.

57. Moreover, the Google records also contain a significant number of mail delivery receipts and confirmations, which in many instances list the last name and city of individuals for whom, based on additional evidence (*e.g.*, Venmo transactions, electronic communications, trash pull items), there is probable cause to believe purchased false and fraudulent COVID-19 vaccination record cards from VAN CAMP and Co-Conspirator-1, including Buyer-1, Buyer-2, and other purchasers in the Western District of Washington and elsewhere.

## ***HHS' Registered Trademark for the CDC's Logo***

58. Effective on or about March 15, 2022, HHS registered the trademark for the CDC's official logo on the principal register in the United States Patent and Trademark Office, pursuant to Registration Number 6672285, specifically listing "Printed vaccination record cards" as among the goods and services to which the trademark applies.

59. As described above, on or about April 11, 2022, VAN CAMP mailed a false and fraudulent COVID-19 vaccination record card to UC4 to a Seattle address in the Western District of Washington, in exchange for a \$175 fee, plus \$15 for shipping, paid by UC4 via money order. The false and fraudulent COVID-19 vaccination record card that VAN CAMP transferred to UC4 contained the CDC's registered trademarked logo.

## **CONCLUSION**

60. Based on the above facts, I respectfully submit that there is probable cause to believe that ROBERT VAN CAMP did knowingly and intentionally conspire and agree with Co-Conspirator-1 and others, known and unknown, to defraud the United States by

1 impairing, impeding, obstructing, and defeating through deceit, craft, trickery, and  
2 dishonest means, the lawful government functions of the United States Department of  
3 Health and Human Services and the Centers for Disease Control and Prevention, a  
4 department and agency, respectively, of the United States, in the administration and  
5 distribution of COVID-19 vaccines and COVID-19 vaccination record cards, in violation  
6 of Title 18, United States Code, Section 371.

7       61. Based on the above facts, I respectfully submit that there is probable cause  
8 to believe that ROBERT VAN CAMP did intentionally traffic in goods, specifically a false  
9 and fraudulent COVID-19 vaccination record card, knowingly using a counterfeit mark,  
10 namely U.S. Trademark Registration 6672285, on and in connection with such goods, in  
11 violation of Title 18, United States Code, Section 2320(a)(1).

LUSILLA PACHECO Digitally signed by LUSILLA PACHECO  
Date: 2022.04.14 15:34:48 -06'00'

LUSILLA PACHECO, Complainant  
Special Agent, HHS-OIG

15 The above-named agent provided a sworn statement attesting to the truth of the  
16 contents of the foregoing affidavit, and based on the Complaint and Affidavit, the Court  
17 hereby finds that there is probable cause to believe the Defendant committed the offenses  
18 set forth in the Complaint.

Dated this 18<sup>th</sup> day of April, 2022.

160

**BRIAN A. TSUCHIDA**  
United States Magistrate Judge